

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIANA MARIA MAYANGELA,

Plaintiff,

v.

BIRO MANUFACTURING COMPANY

Defendant.

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Civil Action No. 8 Civ. 245

BIRO MANUFACTURING COMPANY'S NOTICE OF MOTION TO  
ADMIT PRO HAC VICE

PLEASE TAKE NOTICE that upon the annexed affidavits of movants in support

of this motion and the Certificate(s) of Good Standing annexed thereto we will move this

Court for an Order allowing the admission of movants, Christopher J. Wesser and C.

Stinson Lindenzweig, members of the firm of Moran Brown PC and members in good

standing of the Bar of the State of Virginia, as attorney pro hac vice to argue or try this

case in whole or in part as counsel. There are no pending disciplinary proceedings

against Christopher J. Wesser and C. Stinson Lindenzweig in any State or Federal court.

Dated: Garden City, New York  
June 2, 2008

Respectfully submitted,

BIRO MANUFACTURING COMPANY

By

Frank V. Pesce (FVP 7171)

Fischetti & Pesce, L.L.P.

310 Old Country Road, Suite 210

Garden City, New York 11530

Phone: (516) 873-1511

TO:

GORAYEB & ASSOCIATES, P.C.  
Attorneys for Plaintiff  
100 William Street - Suite 1205  
New York, New York 10038

*Of Counsel:*  
Christopher J. Wesser (VSB No. 44648)  
C. Stinson Lindenzeitig (VSB No. 71214)  
MORAN KIKER BROWN PC  
4110 E. Parham Road  
Richmond, Virginia 23228  
Phone: (804) 421-6250  
*Attorneys for Defendant*  
*The Bivo Manufacturing Company*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

	)	JULIANA MARIA MAYANGELA,
	)	
	)	Plaintiff,
	)	
	)	
	)	
v.	)	
	)	BIRO MANUFACTURING COMPANY
	)	
	)	
Civil Action No. 8 Civ. 245	)	

The Biro Manufacturing Company ("Biro"), pursuant to 22 NYCRR § 520.11, moves the Court for an order admitting Christopher J. Wesser and C. Stinson Lindenzweig *pro hac vice*. This motion is supported by the memorandum below and affidavits of Christopher J. Wesser and C. Stinson Lindenzweig.

Memorandum

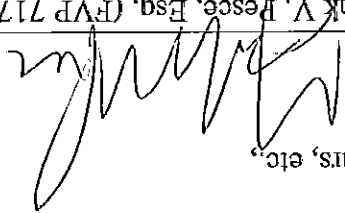
Christopher J. Wesser and C. Stinson Lindenzweig are attorneys with the law firm of Moran Brown PC, 4110 E. Parham Road, Richmond, Virginia 23228, telephone: 804-864-6250. Mr. Wesser and Ms. Lindenzweig are admitted to practice before the Supreme Court of Virginia and are in good standing with the bar in that state.

Mr. Wesser and Ms. Lindenzweig are counsel for Biro, and seek an order from this Court to be admitted *pro hac vice* to practice in New York and represent Biro in this matter. Frank V. Pesce, an attorney with Fischetti & Pesce, L.L.P., will at all times act as attorney of record in this matter.

Based on this, Biro respectfully requests that the Court GRANT its motion for admission *pro hac vice* to allow Christopher J. Wesser and C. Stinson Lindenzweig to practice before this Court in this case.

Dated: Garden City, New York  
June 2, 2008

Yours, etc.,



Frank V. Pesce, Esq. (FVP 7171)

FISCHETTI & PESCE, LLP

Attorneys for Defendant

BIRO MANUFACTURING COMPANY

310 Old Country Road - Suite 201

Garden City, New York 11530

516-873-1511

File No. 9020

Of Counsel:

Dennis R. Kiker (VSB No. 42912)

Christopher J. Wesser (VSB No. 44648)

MORAN KIKER BROWN PC

4110 E. Parham Road

Richmond, Virginia 23228

Phone: (804) 421-6250

Facsimile: (804) 421-6251

Attorneys for Defendant/Third-Party Plaintiff  
BIRO MANUFACTURING COMPANY

TO:

GORAYEB & ASSOCIATES, P.C.  
Attorneys for Plaintiff  
100 William Street - Suite 1205  
New York, New York 10038

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIANA MARIA MAYANGELA,

Plaintiff,

Civil Action No. 8 Civ. 245

BIRO MANUFACTURING COMPANY

Defendant.

**AFFIDAVIT OF CHRISTOPHER J. WESSER IN SUPPORT OF  
MOTION TO ADMIT COUNSEL PRO HAC VICE**

The undersigned, Christopher J. Wesser, being duly sworn, deposes and states as follows:

1. I am an attorney with the law firm of Moran Brown PC, 4110 East Parham Road, Richmond, Virginia 23228.

2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.

3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Virginia.

4. I am admitted to practice in the following courts: the Supreme Court of Virginia; the United States District Court for the Eastern District of Virginia and the United States Courts of Appeals for the DC, Fifth, Seventh, Tenth and Eleventh Circuits and the United States Courts of Appeals for the Seventh and Tenth Circuits.

5. There are no pending disciplinary proceedings against me in any State or Federal court, nor have there ever been.

6. I am familiar with and shall comply with the standards of conduct imposed upon

members of the New York Bar and agree to abide by the rules of this Court, including all

disciplinary rules.

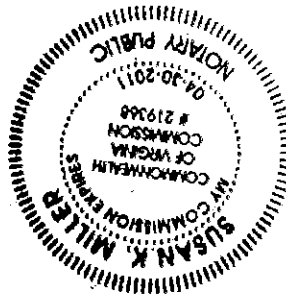
7. Wherefore your affiant respectfully submits that he be permitted to appear as

counsel and advocate *pro hac vice* in this one case.

CHRISTOPHER J. WESSER  
VA State Bar No. 44648  
Moran Brown PC  
4110 East Parham Road  
Richmond, Virginia 23228

Subscribed and sworn to under oath by Christopher J. Wesser this 2nd day of April,

2008, County of Henrico, Virginia.



Notary Public

Susan K. Miller

My Commission Expires:

April 30, 2011

# Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,

do hereby certify that

CHRISTOPHER JAMES WESSER

was admitted to practice as an attorney and counsellor at the bar of this Court on

November 1, 1999.

I further certify that so far as the records of this office are

concerned, CHRISTOPHER JAMES WESSER is a member of the bar of

this Court in good standing.

Witness my hand and seal of said Court

This 28th day of March

A.D. 2008

By:

*Deputy Clerk*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIANA MARIA MAYANCELA,

Plaintiff,

v. BIRO MANUFACTURING COMPANY

Defendant.

Civil Action No. 8 Civ. 245

**AFFIDAVIT OF C. STINSON LINDENZWEIG IN SUPPORT OF  
MOTION TO ADMIT COUNSEL PRO HAC VICE**

The undersigned, C. Stinson Lindenzweig, being duly sworn, deposes and states as

follows:

1. I am an attorney with the law firm of Moran Brown PC, 4110 East Parham Road, Richmond, Virginia 23228.

2. I submit this affidavit in support of my motion for admission to practice *pro hac*

*vice* in the above captioned matter.

3. As shown in the Certificate of Good Standing annexed hereto I am a member in

good standing of the Bar of the State of Virginia.

4. I am admitted to practice in the following courts: the Supreme Court of Virginia

and the United States District Court for the Eastern District of Virginia.

5. There are no pending disciplinary proceedings against me in any State or Federal

court, nor have there ever been.



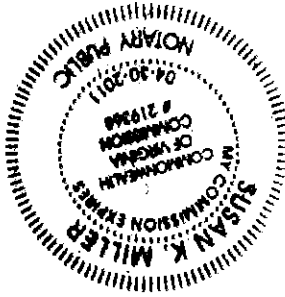
6. I am familiar with and shall comply with the standards of conduct imposed upon members of the New York Bar and agree to abide by the rules of this Court, including all disciplinary rules.

7. Wherefore your affiant respectfully submits that she be permitted to appear as counsel and advocate *pro hac vice* in this one case.

C. STINSON LINDENZWEIG  
VA State Bar No. 71214  
Moran Brown PC  
4110 East Parham Road  
Richmond, Virginia 23228

Subscribed and sworn to under oath by C. Stinson Lindenzweig this 14th day of April,

2008, County of Stafford, Virginia.



Notary Public

My Commission Expires:

04/30/2011

# Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,

do hereby certify that

CANDACE STINSON LINDENZWEIG

was admitted to practice as an attorney and counsellor at the bar of this Court on

October 31, 2005.

I further certify that so far as the records of this office are

concerned, CANDACE STINSON LINDENZWEIG is a member of the bar

of this Court in good standing.

Witness my hand and seal of said Court

This 28th day of March

A.D. 2008

By:

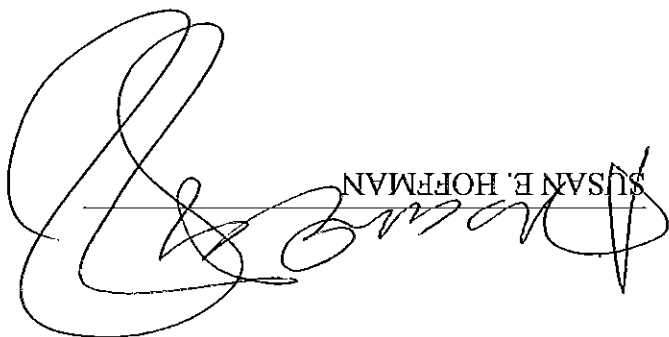
Deputy Clerk

JULIANA MARIA MAYANGELA,  
Plaintiff,  
  
v.  
  
BIRO MANUFACTURING COMPANY  
Defendant.

The motion for admission to practice *pro hac vice* in the above captioned matter is granted. The admitted attorneys, Christopher J. Wesser and C. Stinson Lindenzweig, are permitted to argue or try this particular case in whole or in part as counsel or advocate. This Order confirms your appearance as counsel in this case, and it will be entered on the court's docket. A notation of your admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorneys admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

JUDGE

  
 SUSAN E. HOFFMAN

GORAYEB & ASSOCIATES, P.C.  
 Attorneys for Plaintiff  
 100 William Street - Suite 1205  
 New York, New York 10038

June, 2008 to:

I hereby certify that a true and correct copy of the BIRO MANUFACTURING COMPANY'S  
 NOTICE OF MOTION TO ADMIT PRO HAC VICE was mailed, postage prepaid, this 2<sup>nd</sup> day of

**CERTIFICATE OF SERVICE**

JULIANA MARIA MAYANCELA,  
 Plaintiff,  
 v.  
 BIRO MANUFACTURING COMPANY  
 Defendant.  
 Civil Action No. 08 CV 00245

IN THE UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF NEW YORK